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U.S. DISTRICT COURT
DISTRICT OF MASS.

November 11, 2005

***BY HAND DELIVERY
and FIRST-CLASS MAIL***

The Hon. Marianne B. Bowler
United States District Court
for the District of Massachusetts
John Joseph Moakley U.S. Courthouse
1 Courthouse Way -- Suite 2300
Boston, MA 02210

**Re: In re: Pharmaceutical Industry Average Wholesale Price Litigation,
MDL No. 1456 (Civil Action No. 01-12257-PBS)**

Dear Chief Magistrate Judge Bowler:

I am writing on behalf of Amgen Inc. ("Amgen") regarding two pending motions in this matter: Plaintiffs' Motion for Modification of the Track Two Schedule, as well as Plaintiffs' Motion to Compel Production by Amgen Inc. As the Court is aware, the Motion to Modify is fully briefed and has been referred to Judge Saris for determination. The Motion to Compel, which is before Your Honor, is similarly fully briefed, absent plaintiffs' request for, and the Court's granting of, leave to file a reply memorandum.

The two motions, as they pertain to Amgen, relate to the same set of allegations regarding discovery. More to the point, both motions request relief that, if granted, would modify the existing schedule established by Judge Saris. In much the same way as an overlap exists among the motions mentioned in John Montgomery's letter regarding the plaintiffs' Track One motions, there also exists a clear overlap here, both as to the underlying facts and as to the relief requested. In the interests of time and efficiency, and in order to avoid potentially inconsistent determinations, I am writing to respectfully request that the two motions be heard together.

KELLY, LIBBY & HOOPES, P.C.

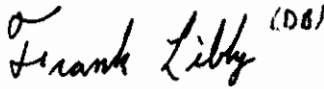
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Should the Court have any questions regarding this request, please let me know and I will promptly respond.

Respectfully submitted,

 (D8)

Frank A. Libby, Jr.

cc: All Counsel (by Lexis/Nexis)